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April 19, 1995

Mr. Robert Heise
Site Assessment Manager
U.S. Environmental Protection Agency
Region VIII, Mail Code (8HWM-SM)
999 18th Street, Suite 500
Denver, Colorado 80202-2405

**Subject: ARCS VI, VII and VIII, Contract No. 68-W9-0053, WA# 19-8JZZ
Focused Site Inspection - Yankton Lighting and Heating Company # 1 Site**

Dear Mr. Heise:

The purpose of this letter is to confirm our recent phone conversation. Field sampling was not conducted as planned for March at the Yankton Lighting and Heating Company # 1 town gas site in Yankton, South Dakota. URS did not sample the site for two reasons. The first reason the site was not sampled was that the exact location of the old gas plant has not been positively identified. The second reason sampling was not conducted was that the City of Yankton deposits snow from street maintenance operations along the lower reaches of Marne Creek near the proposed wetland sample locations. Runoff from snow melt is likely to contain semivolatile organic compounds from automobile emissions which are similar to coal tar compounds making it difficult if not impossible to determine if the site has impacted target wetlands.

An article obtained from the Yankton County Historical Society that was published by Iowa Public Service Company reported a coal gasification plant in operation from approximately 1904 until 1907 at the intersection of Seventh and Douglas Streets. This information in conjunction with the field reconnaissance conducted by URS indicated that the most likely location for a manufactured gas plant was the northeast corner of the intersection of Seventh and Douglas (618 Douglas Street) which was assumed to be the location of the site in the Preliminary Assessment and the Field Sampling Plan. Recently discovered information indicate that the house at 618 Douglas street was constructed in 1875, 25 years prior to the first references of a gas plant in Yankton. This new information decreases the likelihood that the gas plant was located at 618 Douglas. Sam Nelson, Environmental Manager with Midwest Gas, the successor to Iowa Public Service Company believes that the plant at Seventh and Douglas manufactured acetylene gas.

A URS field team consisting of Tim Joseph and Mark Rudolph conducted additional research of the site on March 20, 1995. Research was conducted at the City of Yankton, Register of Deeds office in an attempt to identify property owners near Seventh and Douglas who were associated with early coal gas projects in Yankton. Yankton's records of ownership are complete through the time period, however, no information was discovered that could conclusively locate the old town gas plant. Fred Schnauber who was involved with early coal gasification efforts in Yankton owned land at Seventh and Douglas, however he also owned

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many other properties throughout the city. Land potentially could have been leased to the gas plant operators from any property owner, however, no record of this type of agreement was located.

Research was also conducted at the Yankton Library by reviewing the *Yankton Press and Dakotan* newspaper dated between 1904 and 1907. Several articles were located that discussed the "old gas plant" and the "new gas plant," however none contained the address of the old plant. The articles did, however, reveal some interesting information.

An article in the October 21, 1905 edition of the *Yankton Press and Dakotan* mentioned the delivery to Yankton of a large oil tank and a Tenney gas machine. The Ideal Acetylene Gas Company which later became Yankton Lighting and Heating Company was reportedly erecting a coal gasification plant which would use this machinery. The plant was expected to start operations in November of 1905. No articles were located that specified the location of the plant or when operations commenced. The Yankton Lighting and Heating Company #2 site gas plant reportedly opened in 1907 and used a Tenney gas machine to manufacture gas.

An article in the August 4, 1907 edition of the *Yankton Press and Dakotan* indicated that a company called International Heating and Lighting of Cleveland, Ohio had purchased the old Yankton Plant "some time ago" with plans to convert it to use corn cobs and straw for fuel. The article also mentions that "the old plant will soon be consigned to the junk pile." Later reports indicated that the corn cob and straw gas process proved to be un-workable.

An article in the September 9, 1907 edition of the *Yankton Press and Dakotan* reported that the Cities of Des Moines, Omaha and Sioux City were paving some lightly traveled residential streets with coal tar. The article suggests that coal tar was being generated somewhere in Yankton and that the city of Yankton was considering various use and/or disposal options for the material.

Review of Sanborn fire insurance maps from 1891, 1903 and 1912 show a vacant lot at the northwest corner of Seventh and Douglas. The maps do not show the other corners of the intersection. No additional Sanborn maps are available for the years 1904-1907 when Yankton's first gas plant was allegedly operating. No indications of a former gas plant were observed at Seventh and Douglas during field reconnaissance conducted by URS on March 20, 1995.

In spite of extensive research into the historical record, URS has been unable to confirm the exact location of the Yankton Lighting and Heating Company #1 site. Evidence still suggests that a manufactured gas plant operated from approximately 1904 until 1907 at the intersection of Seventh and Douglas Streets. URS is still prepared to sample the wetlands targets associated with the most probable location of the Yankton Lighting and Heating Company #1

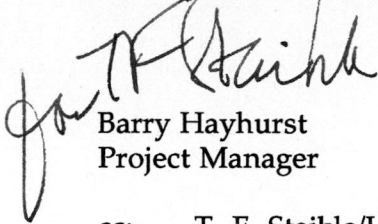
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site. URS recommends that if wetlands sampling is conducted, it be postponed until the City of Yankton's snow removal piles have melted and are not draining into the target area.

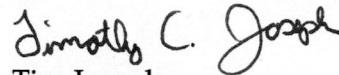
If you have any questions or comments, please call us at 296-9700.

Very truly yours,

URS CONSULTANTS, INC.



Barry Hayhurst
Project Manager



Tim Joseph
Site Investigator

cc: T. F. Staible/URS/Denver
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